PUGET SOUND AIR POLLUTION CONTROL AGENCY
110 Union St. Ste 500
Seattle, WA 98101-2038

JUN 1 1 1998
HELLER, EHRMAN

Facility: ASH GROVE CEMENT COMPANY Reg #: 11339

Inspection Report: 8/7/97 0900 EMG and I met Mr. Brown wearing ID. Explained inspection objectives:

- Inspect for compliance.
- Review conveyor specialist O&M logs and recommendations.
- Interview conveyor specialist
- Review status of compliance with AOD for CP 8291, 8311, and 8355 Condition 2 Operation and Maintenance.

He reviewed with us his follow up to CSR issued during last inspection. He is gathering calibration certificates for weigh feeders and orifice for gas flow. They are adding a column to operator's log for tire feed weights and for natural gas weight. Natural gas is always used as the only fuel during startup. Normally natural gas is not used during normal operations; tires and coal are used as fuel. He may need an extension of time for the updated CEM QA/QC plan. Mr. Guy Cosway, Electrician, will work on it with Duane. He will document their response to the CSR in writing.

Mr. Brown said he has scheduled a meeting with FLA on Aug. 13 at 10 am to discuss the SO2 at startup issue. I confirmed that I could attend this meeting; EMG has a conflict and will probably be unable to attend.

Met Mr. Roger Bliss, conveyor specialist. He works full time, 5 d/wk, 8 hr/d in this position. Mr. Brown thought they would retain the position. He said that he inspects idlers, skirting, belts, scrapers, and problems causing dust. He makes some repairs himself and for others he fills out a work order for plant maintenance to make repairs. He said a dust problem he has identified is when the skirting blows out at a dust dump point. He said they have slowly been accumulating impact saddlers over the past year. They acquire and install about one per month. He explained that the rollers normally have a dip point preventing contact with belt scrapers, however the saddles have solid strips with a better sealing surface. Two days a week (such as, Monday and Thursday) he will make the rounds through the plant to inspect conveyors. The remainder of the week he spends his time addressing problems and troubleshooting. We asked who trained Mr. Bliss, and Mr. Brown and Mr. Bliss said that he trained himself mostly by reviewing literature on conveying systems and by working with other plant employees with conveyor experience.

He said that he does not spend much of his time inspecting and repairing shrink wrap. Instead he said he has trained an assistant to look at it, who has in turn trained a third employee as well. He said training consisted of instruction on how to use a manbasket, how to anchor wrap to the structure, the use of a heat gun, removal of buildup, and patch

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and repair jobs. We inquired about buildup removal. He said if buildup is reported, it is removed in chunks with buckets and/or waterwashed. If holes are reported, then they patch and repair right away. If the job will take more than half a day then they contract it out to Protect.

On average he estimates that the contractor, Protect, comes out about 3 to 4 times a month. He supervises their work. Mr. Brown will fax a log showing the work orders for Protect for the last few months.

Mr. Bliss shared with us examples of the logs that he keeps. See attached daily logs. He also showed us conveyor specific logs. See attached logs for conveyor 531.030 (bottom of clinker storage silos to finish mill - currently being installed with permanent enclosure) and 471.150 (G cooler to clinker storage silo). He also keeps weekly worksheets of his day to day activities.

Mr. Brown said permanent enclosures are being installed in sections. They hope to complete enclosure of conveyor 531.030 by the end of the month. This work is being performed by Nelson Construction. They will start work on the second conveyor (471.150) using a different contractor, Dick's Construction, on August 15, 1997 and they plan to complete it by the end of the year. Currently each conveyor will have two dump stations; they will add more if needed later. Mr. Bliss said they will water wash any dust accumulations to the dump stations.

Mr. Bliss said the flat area of the conveyor to the finish mill is a problem area because water accumulates and pockets of water may cause it to rip. He estimated it has been patched about 20 times since the shrink wrap was first installed in May 1996. He said they try not to make repairs if it is windy or rainy. Usually if they wait a day then weather permits safe repairs.

Mr. Brown said that he spoke with Mr. Al Berault, Hasbro, last Friday to update him on the status of the repairs. Mr. Berault noted that the fallout situation had improved since last year.

We walked out to look at the conveyor shrink wrap condition. Mr. Bliss' assistant, Dave came to describe how he replaced the wrap at the entrance to the finish mill about 3 weeks ago. We observed 2 large holes. The largest was about 4 ft long by 2 ft high per Mr. Brown's estimation. The second one was of similar size. Four smaller holes were observed of about 1 ft long by 2 ft high. Photos were taken. Permanent enclosures were being installed on this conveyor on the west side at the base of the clinker storage silos.

Not so more like 100 away.

We observed dust emissions from the locations where the shrink wrap holes existed. Emissions were continuous and blew vertically up at least 10 ft high into the air at about 5 % opacity. Emissions extended for about 20 ft over the 5 holes at the section closest to the finish mill and extended for about 5 ft over the large hole in the middle section. Emissions were observed continuously from 1030 to 1053 when we walked back to the

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office. Dave said that he does not ever inspect the shrink wrap. Mr. Brown and Mr. Bliss said they had not observed the holes in the shrink wrap. They just noticed them when we pointed them out; no one had previously identified them. Mr. Bliss said that he inspected the shrink wrap Monday and didn't notice the holes. He said he did not note this in his logs. He estimated that the repair could be done in about a half day and would be done in house.

EMG issued NOV 36861 for Reg I Sections 9.15 (c) and 9.20. We advised Mr. Brown that the conveyor specialist or another employee should be responsible for checking the condition of the wrap, noting any problems identified in a log, and documenting corrective actions. This was also noted as a corrective action order on the notice of violation. Mr. Brown said that Mr. Bliss is too busy with maintenance duties on the other belts to perform this function.

8/8/97 Reviewed copies of conveyor specialist's data sheet:

A notation was made on 5/30/97 of "shrink wrap" on 471.150 log. Activity regarding shrink wrap not identified. The 531.030 conveyor log shows a notation on 6/10/97: "Replaced some shrink wrap in past month, idlers, scrape etc.". These were the only notations regarding shrink wrap for the months of May through August 7, 1997.

Reviewed copies of Mr. Bliss's daily log from May 5 through August 6, 1997 for shrink wrap discussions:

May 9, 1997

Kiln up. Dave helped me all day shrink wrap the 471.150 conveyor. There was a big tear about 1/3 of the way up, by the counter weight. We had to wrap 2 pieces about 50 ft. It turned out great. We had to use the small man lift.

May 19, 1997

Kiln up. Ran out and inspected several work orders on the raw materials belts to estimate damage and time involved to repair. Then I shrink wrapped all day on the 471.150 conveyor. There was a section blown off just above the steel rack or about 1/2 way up the conveyor. Darin Depew helped me the whole 6 hours. We also cut and dropped out about 60 feet of material just up from the ripped out section of shrink wrap.

May 21, 1997

Kiln up. Finish mill down for preventative maintenance. Kiln went down last night. G-cooler dust collector was left off. Dallas and I put it back on line and evaluated the mess at the bottom of the 471.150 and all up in the shrink wrap. We need to hi-vac at the tail. The shrink wrap is full of dust, after it hardens we will have to (lift?) it out and remove it, then patch up the plastic. I helped Dallas change out 2 bags in the bag house, compartment #4. Then I did some routine inspections on my belts and wrote a bunch in the preventative maintenance problem log. I started my own folder.

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May 30, 1997

.....We put skirting up in inventory along with shrink wrap.

June 12, 1997

Kiln up. Worked on shrink wrap all day on the 471.150 conveyor from G-cooler to the 6-pack. Dave worked with me. We patched rips, cuts. We rewrapped a section that had blown off and we went up to a couple of areas and cut out some chunks of build up and dropped it to the ground. Tomorrow we will finish up the 471.150. All that remains is cutting and dropping out material and patching it back up. Then we will work on 531.030. This eliminates any dust getting into the atmosphere.

June 13, 1997

Kiln up. Shrink wrap all day. Dave helped me again. We worked on the 471.150 conveyor for about 3 hours, finishing up on cutting out build up of material and repatching shrink wrap. Then we started working on the 531.030 conveyor cutting back loose plastic. Pulling it back in place and patching holes.

June 27, 1997

Kiln up. Worked on 471.150 conveyor with Dave. We went up in the man lift and cut out all of the build up of material and tied off the plastic so we would not lose it.

July 1, 1997

Kiln up. R/m down. Worked with Dave all day. We dug out counter weight for 471.170 conveyor. .... Then we unplugged the tank chute at the tail of the 471.170 conveyor. It was plugged up with dust masks and clinker. Also we planned out tomorrow's day of shrink wrap.

July 2, 1997

Kiln up. Shrink wrap with Dave all day. We worked on the 471.170 conveyor patching up the shrink wrap that we had already cut and dropped material out of. Then we cut and dropped more material out of the wrap on down about 60 more feet. Went up on 530.030 conveyor and cut some water out of the plastic.

This was the last log entry that I found regarding shrink wrap on the conveyors.

8/12/97

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